



42-045-00070
James Adams

Monroe Energy, LLC
4101 Post Road
Trainer, PA 19061
(610) 364-8000

FEDEX 7707 4201 8481

November 20, 2017

Mr. James Rebarchak
Program Manager – Bureau of Air Quality
Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RECEIVED

NOV 23 2017

Air Protection Division

Subject: Monroe Energy, LLC -Trainer Refinery
Notification of Compliance Status for 40 CFR Part 63 Subpart DDDDD for Reactor Effluent Heater H-124-01 (H01) Source ID 747 & Notification of Compliance Status for 40 CFR Part 63 Subpart DDDDD for Stripper Reboiler Heater H-124-02 (H02) Source ID 748

Dear Mr. Rebarchak:

In accordance with 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (Boiler MACT), Monroe Energy, LLC's Trainer Refinery hereby submits this Notification of Compliance Status (NOCS) per 40 CFR §63.7545(e)(1) and (8) for Reactor Effluent Heater H-124-01 & Stripper Reboiler Heater H-124-02, which are permitted as Source 747 & 748 in Plan Approval No. 23-0003AB.

Reactor Effluent Heater H-124-01 & Stripper Reboiler Heater H-124-02 are not subject to any Boiler MACT emissions limitations, and Monroe is therefore not required to conduct an initial performance test as specified in 40 CFR §63.7530(a).

Should you have any questions or require additional information, please contact Mr. Matt Torell, Environmental Leader, at (610) 364-8399.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matt Torell", written over a blue horizontal line.

Matthew Torell, P.E.
Environmental Leader

Enclosure

cc: **FEDEX 7707 4204 0049**
Gerallyn Duke
U.S. EPA Region 3
Office of Permits & State Programs (3AP10)
U.S. EPA, Region III
1650 Arch Street
Philadelphia, Pa 19103-2029



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Responsible Official Certification

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

A handwritten signature in blue ink, appearing to read "Jeffrey K. Warmann", written over a horizontal line.

Jeffrey K. Warmann,

CEO & President

Notification of Compliance Status for 40 CFR Part 63 Subpart DDDDD for Reactor Effluent Heater H-124-01 (H01) Source ID 747 & Notification of Compliance Status for 40 CFR Part 63 Subpart DDDDD for Stripper Reboiler Heater H-124-02 (H02) Source ID 748



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BOILER MACT REQUIRED INFORMATION AND CERTIFICATION
Reactor Effluent Heater H-124-01 (H01) Source ID 747

The NOCS requirements specified in §63.7545(e)(1) and (e)(8) are presented below in **bold font**, followed by Monroe's response in *italics font*.

1. **A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with this subpart, description of the fuel(s) burned, including whether the fuel(s) were a secondary material determined by you or the EPA through a petition process to be a non-waste under §241.3 of this chapter, whether the fuel(s) were a secondary material processed from discarded non-hazardous secondary materials within the meaning of §241.3 of this chapter, and justification for the selection of fuel(s) burned during the compliance demonstration:**

Description of affected unit: Reactor Effluent Heater H-124-01, permitted as Source ID 747 in the Refinery's Plan Approval No. 23-0003AB, is designed to burn gas 1 fuels. This source has a heat input of 71.76 MMBtu/hr, but is currently permitted at 99.6 MMBtu/hr.

Description of add-on controls: This heater does not utilize any add-on controls to comply with the applicable Boiler MACT requirements.

Description of fuels burned: Approved fuels for Reactor Effluent Heater H-124-01 consist of refinery fuel gas. The fuel is not a secondary material determined by Monroe or the U.S. EPA through a petition process to be a non-waste under §241.3. The fuel is not a secondary material processed from discarded non-hazardous secondary materials within the meaning of §241.3.

Justification of fuels burned during the initial compliance demonstration: Not applicable – the MACT Reactor Effluent Heater H-124-01 is not subject to emissions limits pursuant to Subpart DDDDD; therefore, no initial performance test was required to be performed.

2. **In addition to the information required in 40 CFR §63.9(h)(2), your notification of compliance status must include the following certification(s) of compliance, as applicable, and signed by a responsible official:**

40 CFR §63.9(h)(2) does not apply to the Trainer Refinery because it has been issued a Title V permit. Therefore, the NOCS has been prepared in accordance with 40 CFR §63.9(h)(3).

- i. **"This facility completed the required initial tune-up for the process heater that is covered by 40 CFR part 63, subpart DDDDD according to the procedures in §63.7540(a)(10)(i) through (vi)."**

The Trainer Refinery completed the required initial tune-up for this Process Heater according to the procedures in §63.7540(a)(10)(i) through (vi) on November 7, 2017 [§63.7510(e)].



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- ii. "This facility has had an energy assessment performed according to §63.7530(e)."

The Trainer Refinery completed the one-time energy assessment according to 40 CFR §63.7530(e) and Table 3 to Subpart DDDDD by the compliance date of January 31, 2016. The assessment was an accurate depiction of the Trainer Refinery at the time of the assessment. This submittal is certified by the responsible official at the time of submittal and shall serve as the signed certification required by 40 CFR §63.7530(e) that the energy assessment was completed.

- iii. Except for units that burn only natural gas, refinery gas, or other gas 1 fuel, or units that qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act, include the following: "No secondary materials that are solid waste were combusted in any affected unit."

Not applicable. The MACT Boilers and Process Heaters only fire natural gas and refinery fuel gas.



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BOILER MACT REQUIRED INFORMATION AND CERTIFICATION
Stripper Reboiler Heater H-124-02 (H02) Source ID 748

The NOCS requirements specified in §63.7545(e)(1) and (e)(8) are presented below in **bold** font, followed by Monroe's response in *italics* font.

1. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with this subpart, description of the fuel(s) burned, including whether the fuel(s) were a secondary material determined by you or the EPA through a petition process to be a non-waste under §241.3 of this chapter, whether the fuel(s) were a secondary material processed from discarded non-hazardous secondary materials within the meaning of §241.3 of this chapter, and justification for the selection of fuel(s) burned during the compliance demonstration:

Description of affected unit: Stripper Reboiler Heater H-124-02, permitted as Source ID 748 in the Refinery's Plan Approval No. 23-0003AB, is designed to burn gas 1 fuels. This source has a heat input of 44.200 MMbtu/hr.

Description of add-on controls: This heater does not utilize any add-on controls to comply with the applicable Boiler MACT requirements.

Description of fuels burned: Approved fuel for Stripper Reboiler Heater H-124-02 consist of refinery fuel gas. The fuel is not a secondary material determined by Monroe or the U.S. EPA through a petition process to be a non-waste under §241.3. The fuel is not a secondary material processed from discarded non-hazardous secondary materials within the meaning of §241.3.

Justification of fuels burned during the initial compliance demonstration: Not applicable – the MACT Stripper Reboiler Heater H-124-02 is not subject to emissions limits pursuant to Subpart DDDDD; therefore, no initial performance test was required to be performed.

2. In addition to the information required in 40 CFR §63.9(h)(2), your notification of compliance status must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

40 CFR §63.9(h)(2) does not apply to the Trainer Refinery because it has been issued a Title V permit. Therefore, the NOCS has been prepared in accordance with 40 CFR §63.9(h)(3).

- i. "This facility completed the required initial tune-up for the process heater that is covered by 40 CFR part 63, subpart DDDDD according to the procedures in §63.7540(a)(10)(i) through (vi)."

The Trainer Refinery completed the required initial tune-up for this Process Heater according to the procedures in §63.7540(a)(10)(i) through (vi) on November 7, 2017 [§63.7510(e)].



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- iii. Except for units that burn only natural gas, refinery gas, or other gas 1 fuel, or units that qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act, include the following: "No secondary materials that are solid waste were combusted in any affected unit."

Not applicable. The MACT Boilers and Process Heaters only fire natural gas and refinery fuel gas.